

DOCKET SECTION

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

RESPONSES OF NATIONAL NEWSPAPER ASSOCIATION  
TO INTERROGATORIES OF THE UNITED STATES POSTAL SERVICE  
(USPS/NNA-35)

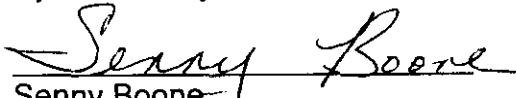
The National Newspaper Association ("NNA") hereby provides the  
following responses of NNA to the interrogatories of the USPS: USPS/NNA-35.

Each interrogatory is stated verbatim and is followed by the answer.

Respectfully submitted,

NATIONAL NEWSPAPER ASSOCIATION

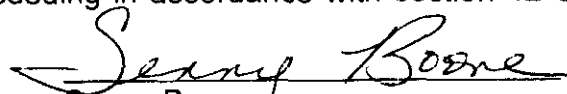
By its attorneys:

  
Senny Boone  
Tonda Rush

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon  
all participants of record in this proceeding in accordance with section 12 of the  
Rules of Practice.

February 20, 1998

  
Senny Boone

USPS/NNA-35. In response to USPS/NNA-1, the National Newspaper Association provided a list of its members and indicated that it did not maintain member records on mail usage.

- a. Does NNA know generally how its members' mailings are prepared and how that preparation has changed for each of the last ten years? If so, please explain fully.
- b. Does NNA have any general information about its members' mailings which would indicate, by year, the changes in make-up such as changes in average bundle size, changes in containerization, and the average number of bundles and pieces per container? If so, please explain fully.
- c. Does NNA have any general information about its members' mailings which would indicate in percentage terms, what savings, if any, its members have experienced in their mail preparation costs (excluding postage) due to changes in the make-up of its mailings? If so, please explain fully.
- d. Even if a percentage cannot be calculated for such savings, as requested in subpart (c) above, please indicate whether or not NNA knows or believes that its members have experienced savings.

#### RESPONSES:

- a. NNA has not surveyed its members over a time period of 10 years. The information NNA has acquired about mail preparation has been provided in response to USPS/NNA T1-5 and Attachment 2 submitted with Interrogatories USPS/NNA T1-1 to 49. NNA notes that its witness Heath writes a regular column for NNA's trade newspaper, Publishers' Auxiliary, advising of changes in mail preparation requirements and in techniques mailers might use to improve list hygiene, sacking and drop shipping. Witness Heath also conducts regular seminars on this subject for the industry. Therefore, NNA would make a calculated guess that mail preparation has improved in quality over the decade, in the sense that mailers take advantage of presort discounts and comply with various new documentation requirements.

b. NNA does not have specific information responsive to this question. It notes its belief, however, that containerization is likely the same over the decade in the sense that sacks--as opposed to pallets or trays--have been used.

c. NNA does not have specific information responsive to this question. However, NNA notes that its members have undergone significant operational changes as a result of Docket MC95-1 and many have invested hours of training in order to comply with new changes. NNA notes that one such training event occurred through the joint sponsorship of USPS and NNA via a satellite conference in June, 1996. The time involved in training alone would indicate an increase in costs, at least in the latter part of the period discussed here.

d. Please see response to c.